

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE-OPELOUSAS DIVISION

LEAM DRILLING SYSTEMS, INC. and  
LIBERTY MUTUAL INSURANCE  
COMPANY

CIVIL ACTION NO.  
6:10-cv-01698

VERSUS

JUDGE DOHERTY

PETROHAWK ENERGY CORPORATION  
and CHUBB & SON, A DIVISION OF FEDERAL  
INSURANCE COMPANY

MAGISTRATE HILL

\*\*\*\*\*

**MOTION FOR LEAVE TO AMEND**  
**COMPLAINT FOR DECLARATORY JUDGMENT**

**NOW INTO COURT**, through undersigned counsel, come Leam Drilling Systems, Inc. and Liberty Mutual Insurance Company, who move this Honorable Court as follows:

1.

Plaintiffs move pursuant to Rule 15(a)(1) to file the attached Amended Complaint for Declaratory Judgment previously filed in the above entitled and numbered cause in order to substitute as a defendant, FEDERAL INSURANCE COMPANY, a foreign insurer organized and existing by virtue of the laws of the State of Indiana who may be cited to appear and answer herein by serving its registered agent for service of process; namely the Louisiana Secretary of State, 8585 Archives Ave., Baton Rouge, LA 70809, in place and instead of Chubb & Son, A Division of Federal Insurance Company.

2.

The above amendment is filed on the grounds that Chubb & Son, A Division of Federal Insurance Company was previously named as defendant Petrohawk Energy Corporation's liability insurer. Plaintiffs have been advised that Federal Insurance Company is the insurer of Petrohawk.

3.

No service has been effected on Chubb & Son herein.

*Respectfully submitted,*

**DAIGLE RAYBURN LLC**

**BY:** /s/Susan A. Daigle  
**SUSAN A. DAIGLE - #4459 (T.A.)**  
**J. DANIEL RAYBURN, JR. - #11404**  
303 W. Vermilion, Ste. 210  
Post Office Box 3667  
Lafayette, Louisiana 70502  
**TEL: (337) 234-7000**

**COUNSEL FOR LEAM DRILLING  
SYSTEMS, INC. and LIBERTY MUTUAL  
INSURANCE COMPANY**

**C E R T I F I C A T E**

**I HEREBY CERTIFY** that a copy of the above and foregoing has this date been filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent by operation of the court's electronic filing system to all parties that have consented to receive service electronically. I also certify that the above and foregoing has this date been forwarded by either facsimile, hand delivery, Federal Express, or U.S. Mail, postage prepaid and properly addressed to the non-CM/ECF participants on this the 4<sup>th</sup> day of January, 2011.

*/s/Susan A. Daigle*  
**SUSAN A. DAIGLE, #4459**